



Division of Public Health Services

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FAX TRANSMITTAL SHEET

DATE: August 11, 2006

TO: Laboratory Director and QA Manager

FROM: Steven D. Baker, Office Chief
Laboratory Services
State Laboratory Services

Subject: Information Update #90

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Prabha Acharya AT (602) 364-0734.*

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Leadership for a Healthy Arizona



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Information Update

August 11, 2006

Update #90

1. Update on Environmental Laboratories Rulemaking;

The Environmental Laboratories Rulemaking Work Group (Work Group) met on May 10, July 12, and July 25 and considered three different versions of the draft rules for Licensing of Environmental Laboratories, 9 A.A.C. 14, Article 6 (draft rules). Through those meetings, ADHS and the Work Group were able to reach consensus on the contents of the draft rules.

On July 27, ADHS presented Revision 2 of the draft rules for consideration at the Environmental Laboratory Advisory Committee (ELAC) meeting, along with a list of changes that had been identified for Revision 3 of the draft rules. After recommending several additional changes, ELAC unanimously recommended that ADHS go forward with Revision 2, as revised by the list of changes and the additional changes identified during the ELAC meeting.

ADHS is now in the process of creating a Notice of Proposed Rulemaking to begin the formal rulemaking process. ADHS intends to file the Notice of Proposed Rulemaking with the Office of the Secretary of State by August 25, 2006. The Notice of Proposed Rulemaking would then be published in the *Arizona Administrative Register* on September 15, 2006, commencing a formal public comment period. During the public comment period, ADHS will accept written comments on the proposed rules and will hold three oral proceedings to accept oral comments and provide an adequate discussion on the proposed rules. ADHS anticipates holding those oral proceedings on October 17 (Flagstaff), October 19 (Phoenix), and October 20 (Tucson). Information on how to provide written comments and the times and locations for the oral proceedings will be included in the Preamble to the Notice of Proposed Rulemaking. The Notice of Proposed Rulemaking will be available at http://www.azdhs.gov/diro/admin_rules/envlabs.htm shortly after it is published on September 15, 2006. Meanwhile, ADHS is making available at that site a list of the changes made from Revision 2 to Revision 3 and Revision 3 itself, which ADHS intends to use in creating the Notice of Proposed Rulemaking.

If you have any questions or comments about this rulemaking, please contact Sarah Harpring at harpris@azdhs.gov or (602) 542-1513.

2. To facilitate the lab-training requirement in R9-14-616, 5. g, in the draft rules, a Calibration Training DVD is in the process of production. To discuss the content and receive input on the DVD, ADHS is holding Public Meetings on the following dates: August 31, 2006, September 29,

2006, October 26, 2006, and November 30, 2006. It will be held from 10:00am to Noon, at the Bureau of State Laboratory Services, 250 N 17th Avenue, Phoenix, AZ 85007. If you need directions, please contact Michelle Melendez at (602) 364-0744.

3. Please make a note that the SW 846 methods 7000B, 7010 and 8000C will be implemented in the upcoming ADHS Rules.
4. The EPA approved the SimPlate method as a stand-alone method. The IDEXX insert is the actual approved method; no method QC is required but a blank is recommended. The laboratories must adhere to all general microbiological requirements specified in the Manual for the Certification of Laboratories Analyzing Drinking Water, 4th ed. For example, pipets must be verified to be within 2.5% accuracy and the laboratory must maintain the traceability of the plates to the analysis (lot #s and dates used) per ADHS rules. Heterotrophic Bacteria must be analyzed within 8 hours of sampling (Part 40 CFR 141.74(a)(1)).
5. Arizona Department of Environmental Quality, effective immediately, is discontinuing the use and request of Freon methods based on the latest directive from EPA.

Existing permits listing methods 418.1, 413.1 or 413.2 should be replaced with EPA Method 1664. Please contact the Julie Hoskin - ADEQ QA/QC and Laboratory Services Manager at (602) 771-4866 if you have any questions.

6. EPA has withdrawn the reactivity interim threshold levels and reactive cyanide and sulfide methods from Chapter Seven of SW-846 and from certain conditional delistings found in appendix IX to 40 CFR Part 261.

EPA concluded that the guidance had significant problems: You can find the details at the following website;

<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/pdf/05-10197.pdf>

7. Please make a note that ADHS Surveyors are now requesting that all electronic data be sent to the Department at least two weeks prior to the audit.
8. Our Office received the following communication from MICE:

First off, it is important to note that petroleum hydrocarbons, in particular GROs and DROs, are not specifically regulated under CERCLA and RCRA. Given this the carbon ranges as noted in Method 8015 are merely suggested ranges for the volatile and non-volatile components. The fact is total petroleum hydrocarbons can be present between the carbon range of C4 to C40, and it would be perfectly acceptable for a local regulator or State to require alternative carbon ranges for quantitation using Method 8015.

It is therefore acceptable to report C6-C10, C10 –C22 and C22-C32 carbon ranges for water samples to match the ranges specified in 8015AZR1, without flagging the data. However, the labs must run and utilize the appropriate marker compounds for quantitation of different carbon ranges. To find more details on the marker compounds and their proper usage, please see the Method 8015AZR1 at the following web-site;

<http://www.azdhs.gov/lab/license/tech/8015azr1.pdf>

9. **Please note:** The Office of Laboratory Services is changing its policy of mailing the application forms for license renewals. The Office will continue to mail out a reminder letter 30 days in advance for in-state labs and 60 days for out-of-state labs. However, the Office will discontinue mailing out the application and will instead provide a link to the application on the Office's web site. If a laboratory does not have access to the web site or has problems downloading the application, please contact our office and we will send you an application. We will begin implementing this practice on October 1, 2006.
10. A reminder for the labs to use all the available digits during the calculation for an analysis, until the final concentration step; for e.g., the section 12.1.3 of EPA method 525.2, Revision 2.0, specifies the following:

Calculations should utilize all available digits of precision, but final reported concentrations should be rounded to an appropriate number of significant figures (one digit of uncertainty).

The Department understands that some laboratories adjust their reporting limits for each sample based on initial sample volume/weight, dilutions, and dry weights, and data users should recognize that this is an acceptable practice.

11. Concerning Thermo Electron Corporation (formerly ThruPut Systems) Target and Target DP Software:

During a recent audit, the Department became aware that a licensed laboratory was required by another state's licensing authority to set the Target chromatography software system configuration calibration mode for environmental applications to "By Amount". This is contrary to the statement in Target's User's Manual, which states that the calibration mode should be set to "By Response" for environmental applications.

For linear and quadratic regression models all calculations have been determined by the Department to be appropriate; however, for review of the calibration graph, the mode should be set to "By Amount" because the software plots response (y-axis) versus concentration (x-axis), as required by EPA Method. The setting to "By Response" inappropriately plots concentration (y-axis) versus response (x-axis). Therefore, Target software system configuration should be setup for environmental applications to "By Amount" for linear and quadratic regression models.

Although "By Amount" setup is acceptable for calculations involving linear and quadratic regression calibration models, it is not appropriate for calibrations using a response or calibration factor (RF/CF). To address the problem with RF/CF, the method configuration should be selected to "Force Calibration Mode to 'By Response' for Average RF".

Laboratories should also be advised to verify all calculations in any software that is utilized by the laboratory, and should include the equations for quantitation in appropriate documentation.

12. Please contact Prabha Acharya @ (602) 364-0734 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ <http://www.azdhs.gov/lab/license/tech/infoup.htm>